

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN**

Re'shane Lonzo, Personal Representative  
of the Estate of Richie Majors, Deceased,

Plaintiff,

Case No.: 2:16-cv-13672  
District Judge: Mark A. Goldsmith  
Magistrate Judge: David R. Grand

v.

Gerlach et al,

Defendants,

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RADNER LAW GROUP, PLLC  
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Keith Altman (P81702)  
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**DEFENDANTS SAVITHRI KAKANI, P.A. AND THOMAS LANORE,  
P.A.'S UNOPPOSED MOTION TO FILE DEFENDANTS' MOTION TO  
ADJOURN UNDER SEAL**

NOW COMES Defendants SAVITHRI KAKANI, P.A. and THOMAS LANORE, P.A. ("Defendants"), by and through their attorneys, CHAPMAN LAW GROUP, respectfully file this Motion to Seal Defendants Motion to Adjourn Trial Date, which contains private health information regarding Defendant Kakani. Defendants state as follows:

1. Defendants will file a Motion to Adjourn the Trial Date on Friday, January 20, 2023.

2. Defendants' motion contains private health information pertaining to Defendant Kakani.

3. As Defendant Kakani's private health information is not the subject of the instant litigation, Defendant does not wish to disclose aspects of Defendant Kakani's private health information via a public filing.

4. Therefore, out of an abundance of caution, Defendants request that the Court permit Defendants to file Defendants' Motion to Adjourn (**Attached as Exhibit A**) under seal.

5. Defendants have filed the sealed motion as an exhibit to this Motion to Seal in accordance with E.D. Mich. LR 5.3(b).

6. On January 19, 2023, counsel for the Defendants reached out to Plaintiff's counsel in order to seek concurrence on this motion to seal. Plaintiff's counsel indicated that he would not oppose this motion.

WHEREFORE, Defendants SAVITHRI KAKANI, P.A. and THOMAS LANORE, P.A., respectfully requests that the Court exercise its discretion and enter an Order permitting Defendants to file their Motion to Adjourn the Trial Date under seal.

Respectfully submitted,  
CHAPMAN LAW GROUP

Dated: January 20, 2023

/s/Devlin Scarber

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**BRIEF IN SUPPORT OF DEFENDANTS SAVITHRI KAKANI, P.A. AND  
THOMAS LANORE, P.A.'S UNOPPOSED MOTION TO FILE  
DEFENDANTS' MOTION TO ADJOURN UNDER SEAL**

**PROOF OF SERVICE**

## **I. INTRODUCTION**

Plaintiff filed the present Complaint under 42 U.S.C. § 1983 against the Defendants, alleging inadequate medical care in violation of the Eighth Amendment. Defendants intend to file a Motion to Adjourn Trial Date on Friday, January 20, 2023. (**Exhibit A**; filed under seal). Defendants' motion contains private health information pertaining to Defendant PA Kakani.

## **II. LEGAL ARGUMENT**

The interest in support of nondisclosure of private health information stated in Defendants' Motion to Adjourn Trial Date (**Exhibit A**; filed under seal) is compelling. *Shane Grp., Inc. v. Blue Cross Blue Shield*, 825 F.3d 299, 305 (6th Cir. 2016); quoting *In re Knoxville News-Sentinel Co.*, 723 F.2d 470, 476 (6th Cir. 1983). ("Only the most compelling reasons can justify non-disclosure of judicial records."). As defendant to this suit, PA Kakani has not placed her medical condition or medical treatment at issue in this litigation. Rather, Defendant merely asks that the Court briefly adjourn the trial date to allow PA Kakani to receive treatment and further recover from said health event. Filing Defendants' Motion to Adjourn under seal will protect PA Kakani's privacy rights while affording the Defendants the ability to adequately support their arguments for a brief adjournment. Moreover, the seal itself is no broader than necessary: Defendants only ask the Court to seal the Motion to

Adjourn and any supporting documentation. *See Shane Grp., Inc. v. Blue Cross Blue Shield*, 825 F.3d 299, 306 (6th Cir. 2016).

WHEREFORE, Defendants SAVITHRI KAKANI, P.A. and THOMAS LANORE, P.A., respectfully request that the Court exercise its discretion and enter an order to seal Defendants Motion to Adjourn Trial Date (**Exhibit A**; filed under seal).

Respectfully submitted,  
CHAPMAN LAW GROUP

Dated: January 20, 2023

/s/Devlin Scarber  
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**PROOF OF SERVICE**

I hereby certify that on January 20, 2023, I presented the foregoing paper to the Clerk of the Court for filing and uploading to the ECF system, which will send notification of such filing to the attorneys of record listed herein and I hereby certify that I have mailed by US Postal Service the document to the involved non participants.

/s/Devlin K. Scarber

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